

# MOUNT PLEASANT FIRE DEPARTMENT

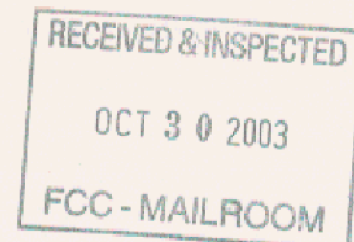
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October 21, 2003

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, WW  
Washington, DC 20554



RE: WT Docket No. 99-87/RM-9332

Dear Ms. Dortch:

The Mount Pleasant Fire Department would like to express its support for the petition for reconsideration filed by the Association of Public-Safety Communications Officials (APCO) and other public safety organizations in the above-referenced proceedings regarding mandatory migration to narrowband operations on land mobile radio systems in the VHF High Band (150-170 MHz) and UHF (421-512) MHz frequencies.

1. **Public safety licensees must be able to expand existing systems with compatible equipment.** The current deadline will stop public safety licensees from adding critical needs to improve their systems. This rule should support adding capacity until the deadline date of Jan. 1, 2013, to coincide with a final complete migration deadline.
2. **Restrictions on new applications must not inhibit interoperability.** The current rule prohibits any new system applied for after Jan. 13, 2004, from operating with 25 kHz equipment. There needs to be an exception to that rule to accommodate new systems that must maintain interoperability with existing 25 kHz-only systems.
3. **Restrictions on equipment certification, manufacturing, and importation should coincide with restrictions on licensees.** The current rule will make it impossible for many state and local governments to add capacity or replace broken and worn-

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out radios after 2008, when 25 kHz capable radio will no longer be allowed to be manufactured or imported. That date should be extended to Jan. 1, 2013, to coincide with a final complete migration deadline.

4. **The Commission Must Permit 25 kHz Bandwidth Operation for Mobile Data and Equivalent Voice Paths.** TDMA and other multi-bandwidth mode equipment can provide important efficiencies for certain types of public safety radio systems. Mobile data systems also provide critical functionality to modern public safety communications operations, but generally require wideband (25 kHz) channels and are consistent with maximum spectral efficiency. The FCC should continue to allow such operations, so long as efficiency guidelines are met.

Respectfully submitted,

Mt. Pleasant Fire Dept.

By:

Wm R. Brown